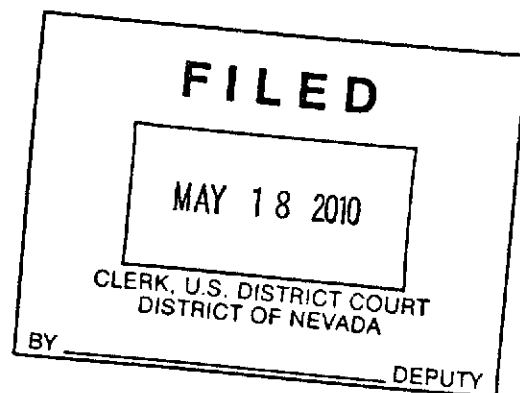


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SEALED

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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 **-oOo-**

9 UNITED STATES OF AMERICA,

10 PLAINTIFF,

11 vs.

12 **DRAGOMIR TASKOV,**
aka Drago,
13 **DIMITAR DIMITROV**
aka Dimitr Dimitrov and Fero,
14 **BOYAN GUEORGUIEV,**
ROSSEN DASKALOV,
15 aka Vesko Simeonov,
YULIYAN MILUSHEV, and
16 **NIKOLAY MLADENOV,**

17 DEFENDANTS.

CRIMINAL INDICTMENT

2:10-CR- 217

VIOLATIONS:

18 U.S.C. § 371-Conspiracy;
18 U.S.C. § 1343 - Wire Fraud
18 U.S.C. § 2514 - Interstate
Transportation of Stolen Property
18 U.S.C. § 2514 - Receipt of Stolen
Property
18 U.S.C. § 2 - Aiding and Abetting

18 **THE GRAND JURY CHARGES:**

19 **COUNT ONE**

20 Conspiracy to Commit Offenses Against the United States

21 1. From a time unknown to the Grand Jury, but no later than in or about March
22 2008 until and including the date of this Indictment, in the District of Nevada and elsewhere,

23 **DRAGOMIR TASKOV,**
24 **DIMITR DIMITROV,**
25 **BOYAN GUEORGUIEV,**
26 **ROSSEN DASKALOV,**
YULIYAN MILUSHEV, and
NIKOLAY MLADENOV,

1
2 the defendants herein, and others known and unknown, did willfully and knowingly combine,
3 conspire, confederate and agree together and with each other to commit the following
4 offenses against the United States:

5 a. Receive, possess, and conceal property of the value of \$5,000 or more,
6 which crossed a State boundary, to wit: between a location outside the State of Nevada and
7 a location inside the State of Nevada, after having been stolen, unlawfully converted, and
8 taken, and knowing the same to have been stolen, unlawfully converted, or taken by fraud,
9 in violation of Title 18, United States Code, Section 2315; and

10 b. Transport and cause to be transported in interstate commerce, to wit:
11 between a location inside the State of Nevada and a location outside the State of Nevada,
12 goods, wares, and merchandise, to wit: automobiles, which were stolen and which each had
13 a value in excess of \$5,000, knowing the same to be stolen, converted or taken, in violation
14 of Title 18, United States Code, Section 2314.

15 c. Transmit and cause the transmission of interstate and foreign wire
16 communication in furtherance and execution of a scheme and artifice to defraud various
17 automobile dealerships and automobile loan finance companies of money and property by
18 means of false and fraudulent pretenses and representations, in violation of Title 18, United
19 States Code, Section 1343.

20 **MANNER AND MEANS OF THE CONSPIRACY**

21 2. **DRAGOMIR TASKOV, DIMITR DIMITROV, BOYAN GUEORGUIEV, ROSSEN**
22 **DASKALOV, YULIYAN MILUSHEV, and NIKOLAY MLADENOV**, and other conspirators
23 manage a complex fraud scheme to obtain vehicles from automobile dealerships in Nevada
24 and elsewhere by obtaining automobile loan financing through false and fraudulent pretenses
25 and representations. Once the vehicles were obtained, some of the vehicles were sold or
26

1 rented to third party buyers or lessors in the United States and some vehicles were smuggled
2 out of the United States to Eastern Europe. The defendants and other conspirators involved
3 in the fraudulent acquisition of the vehicles did not make payments to the finance companies
4 that funded the automobile loans, which resulted in financial loss to the finance companies,
5 automobile dealerships and/or their insurance companies.

6 3. One of the fraud schemes utilized by the defendants and their other conspirators to obtain
7 vehicles involved the use of "straw buyers" who claimed to be employed by fictitious
8 corporations where they earned fictitious lucrative salaries. The straw buyers relied on the
9 automobile dealership or automobile loan finance companies to not fully verify their
10 employment status or income and, subsequently, approve them for automobile loans without
11 full verification.

12 4. A second fraud scheme used to acquire vehicles took advantage of the time delay that
13 occurs between when a straw buyer applies for an automobile loan and when the loan
14 approval is actually posted to the straw buyer's credit report. By purchasing several vehicles
15 in a short period of time, the straw buyer can take advantage of multiple car dealerships in
16 applying for loans. The defendants and their other conspirators would enter several
17 automobile dealerships in a short period of time and apply for credit at each dealership to
18 purchase a vehicle. After getting approved for credit at multiple dealerships, the defendants
19 or their other conspirators would take delivery of all vehicles for which credit was granted
20 before the newly funded automobile loans had a chance to post to the defendants' or their
21 other conspirators' credit report. As a result, the straw buyers secured numerous loans from
22 different automobile loan financing companies without the financing companies knowing
23 about other existing or applied for loans. Under this scheme, the defendants or other
24 conspirators acting as the straw buyers used their own legitimate financial information,

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1 information of other Bulgarian nationals who were out of the country or false or fictitious
2 financial information in applying for the automobile loans.

3 5. Once the straw buyers took delivery of the fraudulently obtained vehicles, they delivered
4 them to a higher level member of the conspiracy, in this case to TASKOV. Members of the
5 conspiracy then sold or rented the automobiles to individuals in Nevada and other states or
6 would smuggle the vehicles out of the United States. The defendants or other conspirators
7 would attempt to wash the titles of fraudulently obtained vehicles or obtain or counterfeit other
8 documents to legitimize their ownership and control of the fraudulently obtained automobiles.

9 OVERT ACTS

10 6. In furtherance of the above-described conspiracy, the defendants committed the
11 following overt acts:

12 a. On or about March 6, 2008, defendant **BOYAN GUEORGUIEV**
13 purchased a 2008 Mercedes S550 from Mercedes Benz of Arrowhead, 9260 W. Bell Road,
14 Peoria, Arizona, financing approximately \$114,039.43 of the purchase price.

15 b. On or about March 6, 2008, defendant **BOYAN GUEORGUIEV**
16 purchased a 2006 Porsche 911 from Porsche North Scottsdale, 1800 N. Scottsdale Road,
17 Phoenix, Arizona, financing approximately \$73,503.75 of the purchase price.

18 c. On or about March 10, 2008, defendant **BOYAN GUEORGUIEV**
19 purchased a 2008 Jeep Wrangler from Integrity Chrysler, 6770 Redwood Street, Las Vegas,
20 Nevada, financing approximately \$41,486.37 of the purchase price.

21 d. On or about March 11, 2008, defendant **BOYAN GUEORGUIEV**
22 purchased a 2008 Sea Ray Boat and 2008 Shorelander Boat Trailer from MarineMax of Las
23 Vegas, 3800 Boulder Highway, Las Vegas, Nevada, financing approximately \$55,845.01 of
24 the purchase price.

1 e. On or about March 11, 2008, defendant **BOYAN GUEORGUIEV**
2 purchased a 2008 two-door Honda Accord from Honda West, 7615 W. Sahara Avenue, Las
3 Vegas, Nevada, financing approximately \$35,868.09 of the purchase price.

4 f. On or about March 11, 2008, defendant **BOYAN GUEORGUIEV**
5 purchased a 2007 Mini Cooper from Desert Mini of Las Vegas, 2333 S. Decatur, Las Vegas,
6 Nevada, financing approximately \$34,399.96 of the purchase price.

7 g. On or about March 12, 2008, defendant **BOYAN GUEORGUIEV**
8 purchased a 2008 Subaru Impreza Wagon from Subaru of Las Vegas, 2025 S. Decatur, Las
9 Vegas, Nevada, financing approximately \$30,311.21 of the purchase price.

10 h. On or about March 13, 2008, defendant **BOYAN GUEORGUIEV**
11 purchased a 2008 Audi Q7 from Desert Audi, 6335 Sahara Avenue, Las Vegas, Nevada,
12 financing approximately \$59,028.77 of the purchase price.

13 i. On or about March 14, 2008, defendant **BOYAN GUEORGUIEV**
14 purchased a 2008 Dodge Sprinter from Integrity Chrysler, 6770 Redwood Street, Las Vegas,
15 Nevada, financing approximately \$52,964.07 of the purchase price.

16 j. On or about March 15, 2008, defendant **BOYAN GUEORGUIEV**
17 purchased a 2008 four-door Nissan Sentra from Desert Nissan, 5800 W. Sahara Avenue, Las
18 Vegas, financing approximately \$27,270.54 of the purchase price.

19 k. On or about March 19, 2008, defendant **BOYAN GUEORGUIEV**
20 purchased a 2008 Toyota Prius from Desert Toyota, 6300 W. Sahara Avenue, Las Vegas,
21 Nevada, financing approximately \$31,737.24 of the purchase price.

22 l. On or about March 20, 2008, defendant **ROSSEN DASKALOV** aka
23 **VESKO SIMEONOV** purchased a 2008 Lexus IS350 from Lexus of Las Vegas, 6600 W.
24 Sahara Avenue, Las Vegas, Nevada, financing approximately \$49,120.87 of the purchase
25 price.

- 1 m. On or about March 24, 2008, defendant **ROSSEN DASKALOV** aka
2 **VESKO SIMEONOV** purchased a 2008 Audi A3 from Desert Audi, 6335 Sahara Avenue, Las
3 Vegas, Nevada, financing approximately \$45,702.94 of the purchase price.
- 4 n. On or about March 24, 2008, defendant **ROSSEN DASKALOV** aka **VESKO**
5 **SIMEONOV** purchased a 2008 Subaru Tribeca from Subaru of Las Vegas, 2025 S. Decatur,
6 Las Vegas, Nevada, financing approximately \$38,286.92 of the purchase price.
- 7 o. On or about March 25, 2008, defendant **ROSSEN DASKALOV** aka **VESKO**
8 **SIMEONOV** purchased a 2008 Jeep Wrangler from Integrity Chrysler, 4770 Redwood Street,
9 Las Vegas, Nevada, financing approximately \$40,215.50 of the purchase price.
- 10 p. On or about April 10, 2008, defendant **ROSSEN DASKALOV** aka **VESKO**
11 **SIMEONOV** purchased a 2008 Tracker Pro 170 and 2008 Trailstar Boat Trailer from Bass
12 Pro Shops, 8200 Dean Martin Drive, Las Vegas, Nevada, financing approximately \$15,110
13 of the purchase price.
- 14 q. On or about April 11, 2008, defendant **ROSSEN DASKALOV** aka **VESKO**
15 **SIMEONOV** purchased a 2008 Honda Civic from Honda West, 7615 W. Sahara Avenue, Las
16 Vegas, Nevada, financing approximately \$21,007.57 of the purchase price.
- 17 r. On or about May 2, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
18 Toyota Prius from Desert Toyota, 6300 W. Sahara Avenue, Las Vegas, Nevada, financing
19 approximately \$31,957.32 of the purchase price.
- 20 s. On or about May 3, 2008, defendant **YULIYAN MILUSHEV** purchased a 2007
21 Volvo S60 from Volvo of Las Vegas, 7705 W. Sahara Avenue, Las Vegas, Nevada, financing
22 approximately \$32,471.09 of the purchase price.
- 23 t. On or about May 3, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
24 Subaru Impreza from Subaru of Las Vegas, 2025 S. Decatur Blvd, Las Vegas, Nevada,
25 financing approximately \$40,334 of the purchase price.
- 26

1 u. On or about May 3, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 2 Honda Accord from Honda West, 7615 W. Sahara Avenue, Las Vegas, Nevada, financing
 3 approximately \$38,542.40 of the purchase price.

4 v. On or about May 5, 2008, defendant **YULIYAN MILUSHEV** purchased
 5 a 2009 Nissan Murano from Desert Nissan, 5800 W. Sahara Avenue, Las Vegas, Nevada,
 6 financing approximately \$38,158.67 of the purchase price.

7 w. On or about May 6, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 8 Acura RDX from Acura of Las Vegas, 7000 W. Sahara Avenue, Las Vegas, Nevada,
 9 financing approximately \$38,377.41 of the purchase price.

10 x. On or about May 7, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 11 Hyundai Accent from Planet Hyundai, 7150 W. Sahara Avenue, Las Vegas, Nevada,
 12 financing approximately \$19,993.68 of the purchase price.

13 y. On or about May 10, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 14 Audi A4 from Desert Audi, 6335 Sahara Avenue, Las Vegas, Nevada, financing
 15 approximately \$29,051.21 of the purchase price.

16 z. On or about May 14, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 17 Kia Spectra from World Kia, 5600 W. Sahara Avenue, Las Vegas, Nevada, financing
 18 approximately \$20,284.46 of the purchase price.

19 aa. On or about May 15, 2008, defendant **YULIYAN MILUSHEV** purchased a 2008
 20 Chevrolet Aveo from Findley Chevrolet, 6800 S. Torrey Pines, Las Vegas, Nevada, financing
 21 approximately \$17,179.17 of the purchase price.

22 **COUNTS TWO through NINE**

23 7. Wire Fraud and Aiding and Abetting)
 24 On or about the dates described below in this Count, in or about March 2008,
 25 in the District of Nevada and elsewhere,
 26

**DRAGOMIR TASKOV,
DIMITR DIMITROV, AND
BOYAN GUEORGUIEV,**

defendants herein, and others known and unknown to the Special Grand Jury, for the purpose of executing the scheme and artifice to defraud described in Paragraphs 2 to 6 of this Indictment, did transmit and cause the transmission and aid and abet the transmission by means of wire communications in interstate commerce of signs, signals and sound as set forth below.

<u>COUNT</u>	<u>ON OR ABOUT DATE</u>	<u>VEHICLE</u>
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Two	March 11, 2008	2007 Mini Cooper
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WIRE TRANSMISSION FOR COUNT TWO: Compass Bank transmitted through the Internet the Credit Approval Notice to Desert Mini of Las Vegas in the State of Nevada.

Three	March 12, 2008	2008 Honda Accord
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WIRE TRANSMISSION FOR COUNT THREE: Compass Bank in Houston, Texas, sent by facsimile a Credit Approval Notice to Honda West in the State of Nevada .

Four	March 14, 2008	2008 Audi Q7
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WIRE TRANSMISSION FOR COUNT FOUR: JPMorgan ChaseBank in New York sent by facsimile a Credit Approval Notice to Desert Audi in the State of Nevada.

Five	March 17, 2008	2008 Dodge Sprinter
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WIRE TRANSMISSION FOR COUNT FIVE: Chrysler Financial transmitted through the Internet the Credit Approval Notice to Integrity Chrysler in the State of Nevada.

Six	March 10, 2008	2008 Jeep Wrangler
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WIRE TRANSMISSION FOR COUNT SIX: Chrysler Financial transmitted through the Internet the Credit Approval Notice to Integrity Chrysler in the State of Nevada.

Seven	March 19, 2008	2008 Toyota Prius
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WIRE TRANSMISSION FOR COUNT SEVEN: Experian Credit transmitted through the Internet the Credit Report to Desert Toyota in the State of Nevada.

1 **Eight** March 19, 2008 2008 Nissan Sentra

2 WIRE TRANSMISSION FOR COUNT EIGHT: Nissan Motors Acceptance paid automobile
3 loan amount through Automated Clearing House deposit to Desert Nissan dealer account
in the State of Nevada.

4 **Nine** March 12, 2008 2008 Subaru Outback

5 WIRE TRANSMISSION FOR COUNT NINE: Experian Credit transmitted through the
6 Internet the Credit Report to Subaru of Las Vegas in the States of Nevada.

7 All in violation of Title 18, United States Code, §§ 1343 and 2

8 **COUNTS TEN through FIFTEEN**
Wire Fraud and Aiding and Abetting

9 16. On or about the dates described below, in or about March and April 2008, in
10 the District of Nevada and elsewhere,

11 **Dragomir TASKOV,**
12 **DIMITR DIMITROV, AND**
13 **ROSSEN DASKALOV,**

14 defendants herein, and others known and unknown to the Special Grand Jury, for the
15 purpose of executing the scheme and artifice to defraud described in Paragraphs 2 to 6 of
16 this Indictment, did transmit and cause the transmission and aid and abet the transmission
17 by means of wire communications in interstate commerce of signs, signals and sound as set
18 forth below.

19 **COUNT ON OR ABOUT DATE VEHICLE**

20 **Ten** March 31, 2008 2008 Audi A3

21 WIRE TRANSMISSION FOR COUNT TEN: Audi Financial Services paid automobile loan
22 amount through Electronic Funds Transfer to the Desert Audi dealer account in the State
of Nevada.

23 **Eleven** April 10, 2008 2008 Tracker Pro Team 170 Boat and
Trailer

24 WIRE TRANSMISSION FOR COUNT ELEVEN: Bass Pro Shop in the State of Nevada
25 sent by facsimile to Springfield, Missouri, a report concerning credit decision.

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1 **Twelve** April 18, 2008 2008 Honda Civic

2 WIRE TRANSMISSION FOR COUNT TWELVE: American Honda Finance paid automobile
3 loan amount through Automated Clearing House deposit to Honda West dealer account
in the State of Nevada.

4 **Thirteen** March 20, 2008 2008 Lexus IS350

5 WIRE TRANSMISSION FOR COUNT THIRTEEN: Toyota Financial Services in Chandler,
6 Arizona, sent by facsimile a Credit Approval Notice to Lexus of Las Vegas in the State of
Nevada.

7 **Fourteen** April 21, 2008 2008 Jeep Wrangler

8 WIRE TRANSMISSION FOR COUNT FOURTEEN: CDLU in Ontario, California sent by
9 facsimile information concerning an Automated Clearing House deposit to Integrity Chrysler
in the State of Nevada.

10 **Fifteen** March 24, 2008 2008 Subaru Tribeca

11 WIRE TRANSMISSION FOR COUNT FIFTEEN: Experian Credit transmitted through the
12 Internet the Credit Report to Subaru of Las Vegas in the States of Nevada.

13 All in violation of Title 18, United States Code, Sections 1343 and 2.

14 **COUNTS SIXTEEN through TWENTY-FOUR**
15 **Wire Fraud and Aiding and Abetting)**

16 16. On or about the dates described below in this Count, in or about May 2008,
17 in the District of Nevada and elsewhere,

18 **DRAGOMIR TASKOV,**
19 **DIMITR DIMITROV, AND**
YULIYAN MILUSHEV,

20 defendants herein, and others known and unknown to the Special Grand Jury, for the
21 purpose of executing the scheme and artifice to defraud described in Paragraphs 2 to 6 of
22 this Indictment, did transmit and cause the transmission and aid and abet the transmission
23 by means of wire communications in interstate commerce of signs, signals and sound as set
24 forth below.

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<u>COUNT</u>	<u>ON OR ABOUT DATE</u>	<u>VEHICLE</u>
Sixteen	May 14, 2008	2008 Acura RDX
WIRE TRANSMISSION FOR COUNT SIXTEEN: American Honda Finance paid automobile loan amount through Automated Clearing House deposit to Acura of Las Vegas bank account in the State of Nevada.		
Seventeen	May 12, 2008	2008 Audi A4
WIRE TRANSMISSION FOR COUNT SEVENTEEN: Wells Fargo Auto Finance in Tempe, Arizona sent by facsimile a Credit Approval Notice to Desert Audi in the State of Nevada.		
Eighteen	May 5, 2008	2008 Toyota Prius
WIRE TRANSMISSION FOR COUNT EIGHTEEN: Experian Credit transmitted through the Internet the Credit Approval Notice to Desert Toyota in the State of Nevada.		
Nineteen	March 19, 2008	2007 Volvo S60
WIRE TRANSMISSION FOR COUNT NINETEEN: Capital One Auto Finance in Plano, Texas sent by facsimile a Credit Decline Notice to Volvo of Las Vegas in the State of Nevada		
Twenty	May 5, 2008	2008 Honda Accord
WIRE TRANSMISSION FOR COUNT TWENTY: TransUnion Credit transmitted through the Internet the Credit Report to Honda West in the State of Nevada		
Twenty-One	March 12, 2008	2009 Nissan Murano
WIRE TRANSMISSION FOR COUNT TWENTY-ONE: Nissan Motor Acceptance paid automobile loan amount through Automated Clearing House deposit to Desert Nissan dealer account in the State of Nevada..		
Twenty-Two	May 7, 2008	2008 Hyundai Accent
WIRE TRANSMISSION FOR COUNT TWENTY-TWO: Hyundai Motor Finance in Fountain Valley, California sent by facsimile a Credit Approval Notice to Planet Hyundai in the State of Nevada.		
Twenty-Three	May 5, 2008	2008 Subaru Impreza
WIRE TRANSMISSION FOR COUNT TWENTY-THREE: JPMorgan ChaseBank in New York sent by facsimile a Credit Approval Notice to Subaru of Las Vegas in the State of Nevada.		
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1 **Twenty-
Four**

May 12, 2008

2008 Chevrolet Aveo

2 WIRE TRANSMISSION FOR COUNT TWENTY-FOUR: GMAC transmitted through the
Internet the Credit Approval Notice to Findley Chevrolet in the State of Nevada

3 All in violation of Title 18, United States Code, Sections 1343 and 2.

4 **COUNT TWENTY-FIVE**

5 Interstate Transportation of Stolen Money
6 and Aiding and Abetting

7 45. From in or about May 2008, through and including on or about February 1,
8 2009, in the District of Nevada and elsewhere,

9 **DRAGOMIR TASKOV,
10 DIMITR DIMITROV, AND
YULIYAN MILUSHEV,**

11 defendants herein, and others known and unknown to the grand jury, did transport in
12 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
13 converted, and taken by fraud, to wit: a 2008 Acura RDX, which crossed a state boundary,
14 to wit: from the State of Nevada to the State of Georgia, and knowing the same to have been
15 stolen, unlawfully converted and taken by fraud.

16 All in violation of Title 18, United States Code, Sections 2314 and 2.

17 **COUNT TWENTY-SIX**

18 Interstate Transportation of Stolen Money
and Aiding and Abetting)

19 45. From in or about May 2008, through and including on or about November 2,
20 2009, in the District of Nevada and elsewhere,

21 **DRAGOMIR TASKOV,
22 DIMITR DIMITROV, AND
ROSSEN DASKALOV,**

23 defendants herein, and others known and unknown to the grand jury, did transport in
24 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
25 converted, and taken by fraud, to wit: a 2008 Jeep Wrangler, which crossed a state
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1 boundary, to wit: from the State of Nevada to the State of New York, and knowing the same
2 to have been stolen, unlawfully converted and taken by fraud. All in violation of Title 18,
3 United States Code, Sections 2314 and 2.

4
5 **COUNT TWENTY-SEVEN**

6 Interstate Transportation of Stolen Money
7 and Aiding and Abetting

8 45. From in or about May 2008, through and including on or about November 12,
9 2009, in the District of Nevada and elsewhere,

10 **DRAGOMIR TASKOV,
11 DIMITR DIMITROV, AND
12 YULIYAN MILUSHEV,**

13 defendants herein, and others known and unknown to the grand jury, did transport in
14 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
15 converted, and taken by fraud, to wit: a 2008 Subaru Impreza, which crossed a state
16 boundary, to wit: from the State of Nevada to the State of California, and knowing the same
17 to have been stolen, unlawfully converted and taken by fraud.

18 All in violation of Title 18, United States Code, Sections 2314 and 2.

19 **COUNT TWENTY-EIGHT**

20 Interstate Transportation of Stolen Money
21 and Aiding and Abetting

22 45. From on or about March 2008, through and including on or about November
23 18, 2009, in the District of Nevada and elsewhere,

24 **DRAGOMIR TASKOV,
25 DIMITR DIMITROV, AND
26 ROSSEN DASKALOV,**

27 defendants herein, and others known and unknown to the grand jury, did transport in
28 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
29 converted, and taken by fraud, to wit: a 2008 Lexus IS350, which crossed a state boundary,

1 to wit: from the State of Nevada to the State of Illinois, and knowing the same to have been
2 stolen, unlawfully converted and taken by fraud.

3 All in violation of Title 18, United States Code, Sections 2314 and 2.

4 **COUNT TWENTY-NINE**

Interstate Transportation of Stolen Money
and Aiding and Abetting

6 45. From on or about October 2009, through and including in or about December
7 2009, in the District of Nevada and elsewhere,

8 **DRAGOMIR TASKOV,**
9 **DIMITR DIMITROV,**
10 **ROSSEN DASKALOV, AND**
11 **NIKOLAY MLADENOV,**

12 defendants herein, and others known and unknown to the grand jury, did transport in
13 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
14 converted, and taken by fraud, to wit: a 2008 Audi A3, which crossed a state boundary, to
15 wit: from the State of Nevada to the State of California, and knowing the same to have been
16 stolen, unlawfully converted and taken by fraud.

17 All in violation of Title 18, United States Code, Sections 2314 and 2.

18 **COUNT THIRTY**

Receipt of Converted and Fraudulently
Taken Property and Aiding and Abetting

19 137. At a time occurring in or about January 2010, in the District of Nevada and
20 elsewhere, the defendants

21 **DRAGOMIR TASKOV,**
22 **DIMITR DIMITROV,**
23 **ROSSEN DASKALOV, AND**
24 **NIKOLAY MLADENOV,**

25 defendants herein, and others known and unknown to the grand jury did receive and conceal
26 property of the value of \$5,000 or more, to wit: a 2008 Audi A3, after being stolen, unlawfully
converted, and taken, which crossed a state boundary, to wit: from the State of California to

1 the State of Nevada, and knowing the same to have been stolen, unlawfully converted and
2 taken.

3 All in violation of Title 18, United States Code, Sections 2315 and 2.

4 **COUNT THIRTY-ONE**

5 Receipt of Converted and Fraudulently
6 Taken Property and Aiding and Abetting

7 137. From on or about March 2008, through and including in or about January 2010,
8 in the District of Nevada and elsewhere, the defendants

9 **DRAGOMIR TASKOV,
DIMITR DIMITROV, AND
BOYAN GUEORGUIEV,**

10 defendants herein, and others known and unknown to the grand jury did receive and conceal
11 property of the value of \$5,000 or more, to wit: a 2008 Mercedes Benz S550, after being
12 stolen, unlawfully converted, and taken, which crossed a state boundary, to wit: from the
13 State of Arizona to the State of Nevada, and knowing the same to have been stolen,
14 unlawfully converted and taken.

15 All in violation of Title 18, United States Code, Sections 2315 and 2.

16 **COUNT THIRTY-TWO**

17 Interstate Transportation of Stolen Money
18 and Aiding and Abetting

19 45. At a time occurring in or about January 2010, in the District of Nevada and
20 elsewhere,

21 **DRAGOMIR TASKOV,
DIMITR DIMITROV,
BOYAN GUEORGUIEV,, and
22 NIKOLAY MLADENOV,**

23 defendants herein, and others known and unknown to the grand jury, did transport in
24 interstate commerce property of the value of \$5,000 or more after being stolen, unlawfully
25 converted, and taken by fraud , to wit: a 2008 Mercedes Benz S550, which crossed a state
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1 boundary, to wit: from the State of Nevada to the State of California, and knowing the same
2 to have been stolen, unlawfully converted and taken by fraud.

3 All in violation of Title 18, United States Code, Sections 2314 and 2.

4 DATED: this 16 day of May 2010

5 A TRUE BILL:

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/s/
FOREPERSON OF THE GRAND JURY

9

DANIEL G. BOGDEN
United States Attorney

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ERIC JOHNSON
Assistant United States Attorney

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